

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Sonja B. Wallace) Case Number 16-30494-KLP
Debtor) Chapter 7
)
)
)

MOTION TO REOPEN CASE

COMES NOW, the Debtors, Sonja B. Wallace, by counsel and hereby moves this Court to reopen case. In support of said Motion, the Debtor states the following:

1. That the Debtor filed a Chapter 7 bankruptcy on February 8, 2016.
2. That her case was discharged on May 23, 2016 and closed on May 31, 2016.
3. That the Debtor had two liens placed on her prior to filing of her bankruptcy, specifically Virginia Credit Union and GMAC.
4. That the Debtor desire to have the liens avoided in order to increase her credit score and allow her to refinance her home.

WHEREFORE, the Debtor, by Counsel, moves the Court to enter an Order to reopen this case.

September 18, 2020

RESPECTFULLY SUBMITTED,

Sonja B. Wallace

By: /s/: Joseph Massie, III
Of Counsel

I ask for this:

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. (35472)
115 N. 1st Street
Richmond, VA 23219
(804) 644-4878 (T)
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jmassie@massielawfirm.com

Sonja B. Wallace
Debtor

16-30494-KLP
Chapter 7

Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion to Reopen Case was served to all necessary parties.

September 18, 2020

By: /s/ Joseph Massie, III

Joseph Massie, III
115 N. 1st Street
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(804) 644-4878 (T)
(804) 644-4874 (F)

Debtor
Sonja B. Wallace
1070 Saint Ann's Drive
Richmond, VA 23225

Trustee
Lynn L. Tavenner
20 North Eighth Street, Second Floor
Richmond, VA 23219

BB & T
P.O. Box 1290
Whiteville, NC 28472

Capital One Bank Usa N
15000 Capital One Dr
Richmond, VA 23238

Carmax Auto Finance
2040 Thalbro St
Richmond, VA 23230

Dept Of Education/Neln
121 S 13th St
Lincoln, NE 68508

Syncb/Jcp
Po Box 965007
Orlando, FL 32896

Syncb/Walmart
Po Box 965024
Orlando, FL 32896

Virginia Credit Union
P. O. Box 90010
Richmond, VA 23225

West Creek Financial
P. O. Box 5518
Foster, VA 23056

GMAC
P.O. Box 2150
Greeley, Co. 80632

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**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Sonja B. Wallace

} Case No. 16-30494-KLP
} Chapter 7
}

NOTICE OF MOTION-NOTICE OF HEARING

Debtor, by counsel, has filed a motion with the court to vacate dismissal of her case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **October 14, 2020 at 10:00 am**, you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.
- ✓ Attend the hearing on the motion scheduled to be held on **October 14, 2020, at 10:00 am**, at the United States Bankruptcy Court, Judge Phillips Courtroom; 701 East Broad Street, Room 5100, Richmond, Virginia 23219.

**Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219**

You must also mail a copy to:

**Joseph S. Massie, III
Massie Law Firm, P.C.
102 E. Cary Street
Richmond, Virginia 23219**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: September 18, 2020

/s/ Joseph S. Massie, III

Joseph S. Massie, III, VSB#35472
Massie Law Firm, P.C.
Attorney for the Debtor
102 E. Cary Street
Richmond, Virginia 23219
jmassie@massielawfirm.com
www.massielawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020 I sent, electronically, or mailed a true and exact copy of the foregoing Notice of Motion to all necessary parties.

RESPECTFULLY SUBMITTED
Sonja B. Wallace

/s/ Joseph S. Massie, III
Joseph S. Massie, III, VSB#35472

Sonja B. Wallace
1070 Saint Ann's Drive
Richmond, VA 23225

Trustee
Lynn L. Tavenner
20 North Eighth Street, Second Floor
Richmond, VA 23219

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Richmond, VA 23219-0000